

IN THE CIRCUIT COURT OF MARYLAND FOR ANNE ARUNDEL COUNTY

STATE OF MARYLAND

vs.

TERANCE FALTER

Case No.: C-02-CR-22-001847

**ANSWER TO OMNIBUS MOTION PURSUANT TO
RULE 4-252 MARYLAND RULES OF PROCEDURE**

Now comes Stephen M. Boyer, Assistant State's Attorney for Anne Arundel County, and in Answer to Omnibus Motion to Rule 4-252 Maryland Rules of Procedure, states and alleges as follows:

1. The State denies any and all allegations of misconduct in this case.
2. Nothing in this case warrants any of the relief sought in Defendant's Omnibus Motion.
3. Your *Omnibus* motion does not appropriately advise the State of the suppression issues which you contend necessitate the suppression of the State's evidence in the instant matter and what legal precepts support this position. See Denicolis v. State, 378 Md. 646, 659-661 (2003) and *Sinclair v. State* No. 43, 2014 Term. Without your disclosure of said matters, the State is unable to appropriately answer or defend your client's motions.
4. Please kindly re-file an opposite motion which is in compliance with Maryland Rule 4-252 and which provides the things you seek to have suppressed and the legal precepts upon which you are relying. In addition, please provide the names of the detectives and witnesses whom you intend on calling as witnesses. The State, in turn, will promptly file an appropriate answer. If the State does not receive your revised pleadings within 15 days of this letter's date, the State will have no alternative but to file a motion to strike your omnibus motion to suppress

evidence.

WHEREFORE, the State prays this Honorable Court:

- (A) Deny the Defendant's Omnibus Motion.
- (B) For such other and further relief as the nature of this case requires.

01/27/23

Date

/s/

Stephen M. Boyer
Assistant State's Attorney for Anne
Arundel County
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251 Rowe Blvd, Suite 332
Annapolis, MD 21401
410-222-1740

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of January, 2023 a copy of the foregoing Answer to Omnibus Motion Pursuant to Rule 4-252 Maryland Rules of Procedure, was electronically provided to: Office of the Public Defender, 1700 Margaret Ave., Annapolis, MD 21401 at Tara.Robb@maryland.gov, Attorney for Defendant.

/s/

Stephen M. Boyer
Assistant State's Attorney